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July 12, 2018

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Honorable Joseph F. Bianco
United States District Judge
Eastern District of New York
United States Courthouse
100 Federal Plaza
Central Islip, New York

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ JUL 12 2018 ★

LONG ISLAND OFFICE

BY ECF

Re: United States v. Kenner & Constantine
13 Cr. 607 (JFB)

Dear Judge Bianco:

Defendant Tommy Constantine ("Constantine") and *Pro Se* co-defendant Philip Kenner ("Kenner") respectfully submit this joint letter for another extension of the due date of their oppositions to the government's Forfeiture Motion to approximately forty-five days from today. The forensic account assigned to both defendants is currently conducting his examination of the data. He anticipates completion in about 30 days. Additionally, he has been unavailable to go the MDC to meet with Kenner until next week. The government, by Assistant United States Attorney Diane Leonardo, consents to this application so long as the government's reply deadline is proportionately extended.

Thank you for Your Honor's consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Diane Leonardo (by ECF)
AUSA Madeline O'Connor (by ECF)
AUSA Saritha Komatireddy (by ECF)
AUSA Matthew Haggans (by ECF)
Philip Kenner (by hand)

SO ORDERED

/s/ Joseph F. Bianco

Joseph F. Bianco
USDJ

Date: July 12 20 18
Central Islip, N.Y.

*Request granted.
Opposition papers
are due August 29,
2018. Reply
papers are due
September 29, 2018.
Oral argument is scheduled
for October 19, 2018,
at 1:30 pm*